

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Virginia**

UNITED STATES OF AMERICA,

v.

EL SHAFEE ELSHEIKH,
Defendant.

Case No. 1:20CR239-2
Honorable T.S. Ellis, III

Trial: Jan. 18, 2022

**DEFENDANT’S OBJECTIONS TO
GOVERNMENT’S PROPOSED JURY INSTRUCTIONS**

El Shafee Elsheikh, by counsel, pursuant to this Court’s Scheduling Order (Dkt. 173), dated December 8, 2021, hereby submits the following objections to the government’s Proposed Jury Instructions (Dkt. 182).

OBJECTIONS

- *Government’s Proposed Instruction No. 23.* This instruction is not a standard instruction and is not an accurate statement of the law.
- *Government’s Proposed Instruction No. 28.* The instruction, as written, is merely a conclusionary statement based in part on language from the indictment. An introductory statement must be added to each paragraph of the instruction to make clear that this instruction is simply a recitation of the charging instrument, such as “Count ____ of the Indictment charges that:”
- *Government’s Proposed Instruction No. 30.* This instruction is not a standard instruction and is not an accurate statement of the law.
- *Government’s Proposed Instruction No. 31.* This instruction is not an accurate statement of the law.

Respectfully Submitted,

EL SHAFEE ELSHEIKH,
By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of January 2021, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

_____/s/_____
Zachary A. Deubler, Esq.